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January 10, 2001

VIA HAND DELIVERY

Mr. K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

***Re: Rulemaking Amendments of Regulations for Telephone Service Providers
Docket No.00-00873.***

Dear Mr. Waddell:

Enclosed please find the original and thirteen (13) copies of the Workshop I Comments of Concord Telephone Exchange, Inc., Humphreys County Telephone Company, Tellico Telephone Company, Inc., and Tennessee Telephone Company pursuant to Appendix A of the January 4, 2001 Notice of Workshops.

If you have any questions, please do not hesitate to contact me.

Best regards.

Very truly yours,



R. Dale Grimes

RDG/gci
Enclosures

cc: Service List
Mr. Bruce Mottern
Ms. Linda Lowrance

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

RULEMAKING AMENDMENTS OF
REGULATIONS FOR TELEPHONE
SERVICE PROVIDERS

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Docket No. 00-00873

**WORKSHOP I COMMENTS OF CONCORD TELEPHONE EXCHANGE, INC.,
HUMPHREYS COUNTY TELEPHONE COMPANY, TELlico TELEPHONE
COMPANY, INC., AND TENNESSEE TELEPHONE COMPANY**

Concord Telephone Exchange, Inc., Humphreys County Telephone Company, Tellico Telephone Company, Inc., and Tennessee Telephone Company, collectively ("TDS TELECOM"), by their attorneys, respectfully submit their comments for Workshop I in the matter of Amendments to Chapter 1220-4-2, Regulations for Telephone Telecommunications Service Providers. In the September 29, 2000 Notice of Rulemaking, the Tennessee Regulatory Authority ("TRA") proposed an extensive overhaul of the rules for Telecommunications Service Providers. As stated in the proposed Scope of Regulations, 1220-4-2-.02,

The purpose of this Chapter is to establish minimum quality of services standards and general regulations for all telecommunications service providers providing telecommunications service, as defined in this Chapter. The regulations are designed to ensure that Tennesseans continue to have access to quality telephone services in an emerging competitive telecommunications environment. This Chapter attempts to balance our state's policy of pro-competition in the telecommunications sector with the service quality expectations of our citizens as well as privacy concerns.

These are laudable goals and appropriate to serve as a guidé during this rulemaking.

TDS TELECOM recognizes that the evolutionary change being experienced by the telecommunications industry since enactment of the Telecommunications Act of 1996 gives rise to the need to review and reform existing regulations to better meet the needs of Tennesseans.

However, the proposed rules as written would serve to burden telecommunications providers within the state with additional onerous regulation and increased cost of compliance. The purpose of the Telecommunications Act of 1996 is “to promote competition and reduce regulation in order to secure lower prices and higher quality services for American telecommunications consumers” (*emphasis added*).

TDS TELECOM is hopeful that during this workshop process the industry can work cooperatively with the TRA to craft rule revisions that meet the goals outlined by the Authority without placing additional excessive burdens on the state’s telecommunications providers. In preparation for Workshop I, TDS TELECOM offers the following general comments regarding the stated purpose of this rulemaking. TDS TELECOM reserves the right to comment further on specific rules during the workshop.

I. PROPOSED RULES SHOULD ESTABLISH MINIMUM QUALITY OF SERVICES STANDARDS AND GENERAL REGULATIONS FOR ALL TELECOMMUNICATIONS SERVICE PROVIDERS.

The purpose of this Chapter as stated is to establish minimum quality of service standards and general regulations for all telecommunications service providers. Even so, many of the proposed rules single out only incumbent carriers or those designated as eligible telecommunications carriers. Providing quality telecommunications services to Tennessee consumers should be the responsibility of all certificated telecommunications service providers, not just those that have assumed the added responsibility of providing certain basic services universally throughout a defined service area.

In competitive markets, information is critical if consumers are to make rational choices. The collection of service quality data will provide little benefit to consumers if they do not have access to comparable information from all carriers in their area. To the extent that it is

determined during the workshop process that certain data collection is required, reporting requirements should be applied consistently to all carriers.

II. REGULATIONS CAN BE ADAPTED TO REFLECT THE EMERGING COMPETITIVE TELECOMMUNICATIONS ENVIRONMENT WITHOUT UNDULY BURDENING CARRIERS WITH NEW REQUIREMENTS.

As recognized by the Telecommunications Act of 1996, increased competition in the markets for telecommunications services should lessen the need for regulatory intervention in those markets. Even so, the proposed rule revisions subject service providers to increased regulatory requirements. The stated purpose of this rulemaking is to establish minimum service quality standards, yet the proposed rules far exceed the scope of minimum standards. Many of the proposed reporting requirements require detailed data collection that if adopted will require major, and costly, modification to carriers' systems. In some cases, current systems are not able to be adapted, which will result in administratively burdensome manual processes to collect and report on service quality measures.

TDS TELECOM recognizes that it is the responsibility of all telecommunications providers to provide the highest quality service to Tennessee consumers. Likewise, it is the duty of the Authority to ensure that consumers do in fact receive the quality services they desire. Today, many of Tennessee's telecommunications providers already provide exceptional service quality to their customers. Not only are the existing quality standards met, in many cases they are exceeded. TDS TELECOM is committed to providing quality service(s) throughout all of its existing service area. Not only is it concerned with the initial provisioning of service, but also all aspects of customer interactions -- ordering, network provisioning, monitoring, repair and the payment and collection process. TDS TELECOM is active in the communities served, with business offices in some locations being a community focal point.

As the telecommunications market grows more competitive, the need for companies to provide the highest quality service to attract and keep customers will serve as the primary incentive to maintain high quality service. Accordingly, TDS TELECOM doubts the need for and nature of the TRA proposed extensive rules. TDS TELECOM is simply not aware of any significant service related issues. Excessive regulation and reporting will only serve to shift companies' resources away from serving customers to focus on regulatory compliance.

III. JOINT INDUSTRY RULE OBJECTIONS AND SUGGESTED REVISIONS.

As directed by the Authority in the December 15, 2000 Order Granting Motion in Part to Establish Workshops, TDS TELECOM has participated with other members of industry in an effort to reach consensus where possible on the proposed rules and suggested revisions thereto. TDS TELECOM has had opportunity to review the Industry Members Suggested Revisions and concurs in those comments and revisions as they represent common concerns of Tennessee's telecommunications providers.

IV. CONCLUSION.

As the Tennessee workshop process proceeds, the Authority must recognize that any new requirements will bear associated costs. The focus should be on developing minimum regulatory standards to be applied to all telecommunications service providers that will serve to safeguard quality telecommunications services for Tennessee consumers. Cooperative efforts during the workshop process to strike a balance between this objective while minimizing the burden placed on service providers will serve to advance the state of telecommunications services in Tennessee.

Dated: January 10, 2001

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2001, a copy of the foregoing document was served on the parties of record, via the method indicated:

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